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9 *Attorneys for Court-Appointed Monitor,*  
*Thomas W. McNamara*

11 UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

13 THOMAS W. MCNAMARA, as the Court-  
Appointed Monitor for AMG Capital  
14 Management, LLC; et al.,

15 Plaintiff,

16 v.

17 STEALTH POWER, LLC (f/k/a Energy  
Xtreme, LLC), a Texas Limited Liability  
Company,

18 Defendant.

Case No. 2:18-cv-01813-GMN-NJK

**STIPULATION AND ORDER TO EXTEND  
TIME FOR MONITOR TO REPLY TO  
DEFENDANT STEALTH POWER, LLC'S  
OPPOSITION TO MONITOR'S MOTION  
FOR SUMMARY JUDGMENT AND  
MOTION FOR JUDGMENT ON THE  
PLEADINGS**

**(FIRST REQUEST)**

21 Pursuant to LR IA 6-1, Plaintiff, Thomas W. McNamara ("Plaintiff" or "Monitor"), in his  
22 capacity as court-appointed Monitor, and Defendant Stealth Power, LLC ("Defendant") hereby  
23 stipulate to extend time for the Monitor to respond to Defendant's Opposition to Monitor's  
24 Motion for Summary Judgment and Judgment on the Pleadings (ECF No. 39) and Defendant's  
25 Motion to Strike Request for Judgment on the Pleadings, or in the alternative, Opposition to  
26 Motion for Judgment on the Pleadings (ECF Nos. 40 and 41) filed on December 11, 2019. This  
27 is the parties' first request for an extension of time to respond. Good cause exists to extend the  
28 deadlines as set forth below.

1 WHEREAS, the Monitor filed his Motion for Summary Judgment on First Count for  
2 Account Stated and Motion for Judgment on the Pleadings as to Defendant's Second through  
3 Eleventh Affirmative Defenses on November 12, 2019. (ECF No. 30.) On November 26, 2019,  
4 Defendant filed its Motion for Extension of Time to Respond to Monitor's Motion for Summary  
5 Judgment by Eight Days. (ECF No. 35.) On November 27, 2019, the Court entered an Order  
6 (ECF No. 36) granting Defendant's motion and extending the time for Defendant to respond to  
7 the motion for summary judgment until December 11, 2019.

8 WHEREAS, on December 11, 2019, Defendant filed its Opposition to Monitor's Motion  
9 for Summary Judgment and Judgment on the Pleadings (ECF No. 39) and Motion to Strike  
10 Request for Judgment on the Pleadings, or in the alternative, Opposition to Motion for Judgment  
11 on the Pleadings (ECF Nos. 40 and 41).

12 WHEREAS, the Monitor's current deadline to respond to Defendant's Opposition to  
13 Monitor's Motion for Summary Judgment and Judgment on the Pleadings is December 25, 2019;

14 WHEREAS, the Monitor's current deadline to respond to Defendant's Motion to Strike  
15 Request for Judgment on the Pleadings, or in the alternative, Opposition to Motion for Judgment  
16 on the Pleadings is December 25, 2019 and December 18, 2019, respectively;

17 WHEREAS, the Monitor requested and Defendant agreed to extend time beyond the  
18 current deadline to January 3, 2020 due to the upcoming holidays. The Monitor and his counsel  
19 appreciates the brief extension to minimize disruption on preexisting family commitments; and

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1 WHEREAS, the parties agree, subject to Court approval, that the Monitor's deadline to  
2 respond to Defendant's Opposition to Monitor's Motion for Summary Judgment and Judgment  
3 on the Pleadings (ECF No. 39) and Defendant's Motion to Strike Request for Judgment on the  
4 Pleadings, or in the alternative, Opposition to Motion for Judgment on the Pleadings (ECF Nos.  
5 40 and 41) shall be extended to January 3, 2020.

6 The parties respectfully request that the Court grant this stipulation.

7 Dated: December 17, 2019

Dated: December 17, 2019

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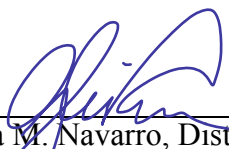
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18 *Attorney for Defendant Stealth Power, LLC*

*Attorneys for Court-Appointed Monitor,  
Thomas W. McNamara*

19  
20 **IT IS SO ORDERED.**

21 Dated this 31 day of December, 2019.

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25 Gloria M. Navarro, District Judge  
United States District Court  
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 17th day of December 2019, pursuant to Fed. R. Civ. P. 5(b), I  
3 served via CM/ECF or delivered by email and mailing in the U.S. Mail a true and correct copy of  
4 the foregoing **STIPULATION AND ORDER TO EXTEND TIME FOR MONITOR TO  
REPLY TO DEFENDANT STEALTH POWER, LLC'S OPPOSITION TO MONITOR'S  
MOTION FOR SUMMARY JUDGMENT AND MOTION FOR JUDGMENT ON THE  
PLEADINGS**, postage prepaid and addressed to the following:

5  
6 **VIA CM/ECF**

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13 /s/ Edward Chang

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